



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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October 3, 2022

**Via CM/ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 20D  
New York, New York 10007

Re: *Brown v. New York City Department of Education*  
Civil Action No. 1:20-CV-02424-VEC-OTW

Dear Judge Wang:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendant, the Board of Education of the City School District of the City of New York, operating as the New York City Department of Education ("Defendant"), in the above-referenced action. In accord with Your Honor's Individual Rules of Practice, I write to respectfully request a thirty-day extension of time for Defendant to file an answer to Plaintiff's Second Amended Complaint, from October 5, 2022, to November 4, 2022. This is Defendant's first request for this relief. Plaintiff consents to the requested extension, which would not affect any other deadlines in this case.

This thirty-day extension of time is requested to allow Defendant adequate time to investigate the Second Amended Complaint's allegations and prepare an appropriate response thereto. Additionally, I presently have a high volume of other employment-related matters in both federal and state court. Consequently, I request an additional month in which to prepare an appropriate answer.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Zachary T. Ellis  
Assistant Corporation Counsel

cc: Pro-Se Plaintiff Mary Hurd Brown (by CM/ECF)